

Proceeding 03-104 Comments

American Radio Relay League studies have conclusively documented that Broadband over Power Lines (BPL) will render the HF frequencies from approximately 2 to 80 MHz unusable. For details of the study, please see:

<http://www.arrl.org/announce/regulatory/et03-104/reply-comments-index.html>

I am strongly opposed to BPL for the following reasons:

Emergency Communications:

The Amateur Radio service benefits the entire US population. Amateur Radio's role in providing communication during natural disasters and other emergency events is well documented. When regular communication services are inoperative or unusable due to excess traffic, the HF bands are the best and quite possibly only option for quickly communicating over significant distances.

The importance of Amateur Radio's role in emergency communication has never been greater. Technology has advanced and society has become increasingly dependent upon it. At the same time, our electric infrastructure has deteriorated to the point that large segments of our country can lose service without warning or obvious cause leaving people in the dark. In addition, the changing nature and geopolitical unrest of our world increases the probability that the Amateur Radio service will be needed more than ever before to supply vital communication and information.

Recognizing the importance of Amateur Radio, the ARRL has been made an official affiliate program of Citizen Corps, an initiative within the Department of Homeland Security to enhance public preparedness and safety. Citizen Corps Liaison to the White House Liz DiGregorio called ham radio operators the "first of the first responders". BPL would severely restrict or eliminate what has been recognized as an extremely valuable resource.

Viable Alternatives to BPL, Not HF:

There are multiple alternatives for Internet access. Connecting is already as easy as plugging into a telephone jack in any room of your home or business. In addition, there are also Cable and Satellite options. Regulating BPL so that it does not interfere with Amateur Radio would have little or no effect on Internet access. However, interference from BPL to the HF spectrum would have a direct and profound effect on the Amateur Radio service. The properties of the HF spectrum are unique. For the Amateur Radio service there are no alternatives.

Other Benefits of the Amateur Radio Service:

In addition to emergency communications, the Amateur Radio service enhances international good will, the radio art, skills in both the communication and technical phases of the art and provides a means of expanding the reservoir of trained operators, technicians and electronic experts. BPL would preclude all these benefits provided by the Amateur Radio service.

Conclusion:

BPL's rendering of the HF bands as unusable by the Amateur Radio service is totally unacceptable and cannot be allowed to occur. Amateur Radio is a vital service in emergency communication that is most often needed when least expected. The Amateur Radio service also serves our country by advancing the radio art in skills and communication.

I respectfully and passionately request that BPL be reviewed before implementation of any kind and strictly regulated so that it does not cause harmful interference to the HF spectrum already occupied and used efficiently by Amateur Radio and other important services.

Sincerely,

G. Scott Davis
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